

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 05m-1130-JGD
)
 ROBERT CLOUTIER)

MOTION TO ALLOW THE DEFENDANT
TO TRAVEL IN ORDER TO ASSIST HIS BROTHER IN MOVING

The defendant, Robert Cloutier, respectfully requests that this Court allow him to leave the District of Massachusetts from November 2, 2005 to November 6, 2005 to travel to Providence, RI then to Derry, NH in order to assist his older brother David Cloutier in moving. He would be staying with his brother and his brother's wife from the 2nd until the 4th in Providence then in Derry on the 5th. Mr. Cloutier will be under the supervision of his brother and his brother's wife throughout the period in issue. There are no children living in the home.

The government, per Assistant United States Attorney Timothy Feeley, assents to this motion. Pre-trial Services Officer David Picozzi assents to this request.

ROBERT CLOUTIER
By his attorney,

/s/ Catherine K. Byrne
Catherine K. Byrne
B.B.O. #543838
Federal Defender Office
408 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Tel: 617-223-8061

Date: October 27, 2005